

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on June 26, 2012.

Permit Number: **R30-09500001-2012**

Application Received: **October 9, 2012**

Plant Identification Number: **03-54-09500001**

Permittee: **MPM Silicones, LLC**

Facility Name: **Sistersville**

Mailing Address: **3500 South State Route 2, Friendly, WV 26146-9720**

Permit Action Number: *MM01*      Revised: March 25, 2013

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Physical Location:	Friendly, Tyler County, West Virginia
UTM Coordinates:	492 km Easting • 4370.5 km Northing • Zone 17
Directions:	WV State Route 2 approximately six miles south of Sistersville.

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### Facility Description

MPM Silicones, LLC, is located approximately six miles south of Sistersville, WV on State Route 2. The Sistersville Plant is located in a rural setting and is situated on approximately 1300 acres of land. The operating areas are situated centrally and encompass approximately 50 acres. The Sistersville Plant is engaged in specialty chemical manufacturing (SIC 2869) and manufactures a broad range of silicone and silane products, plus organic chemical intermediates related to the silanes and silicones products. The site operates 24 hours a day and consists of a number of continuous and batch processes.

This modification is to update the emission units table to include a new pressure vessel, T-2082, for the storage of methyl chloride.

### Emissions Summary

There are no changes in emissions associated with the proposed change.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 146.1 TPY of NO<sub>x</sub>, 633.2 TPY of VOC, 69.8 TPY of ethyl chloride, 31.5 TPY of hydrogen chloride, 55.5 TPY of methanol, 48.3 TPY of propionaldehyde, 168.1 TPY of toluene, and 391.82 TPY of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, MPM Silicones, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13 45CSR30	NSR Permits. Operating permit requirement.
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-16	8/16/1973	
R13-50	4/18/1974	
R13-657	4/15/1982	
R13-952C	6/30/2005	
R13-1649B	10/31/2006	
R13-1746B	12/15/2006	
R13-1748A	1/05/2006	
R13-2030A	10/12/1999	
R13-2180D	1/08/2013	
R13-2338I	12/15/2011	
R13-2806	10/05/2009	

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
G60-C030	1/18/2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### Determinations and Justifications

In the section 1.1. Emission Units Table emission unit T-2082 was added to Emission Group 307 to reflect changes made in R13-2180D.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to T-2082 due to the following:

- 40 C.F.R. 60 Subpart Kb – Per 40 C.F.R. §60.110b(a), 40 C.F.R. 60 Subpart Kb applies to storage vessels with a capacity greater than or equal to 75 cubic meters. As T-2082 will have a design capacity of 8,200 gallons, which is less than 75 cubic meters (19,813 gallons), Subpart Kb will not apply.
- 40 C.F.R. 63 Subpart FFFF – Under the 40 C.F.R. §63.2550(i) definition of storage tank, pressure vessels designed to operate in excess of 204.9 kPa (204.9 kPa = 29.7 psia) are not considered storage tanks. Tank T-2082's normal operating pressure is 90-120 psig thus it is not defined as a storage tank, and there are no substantive requirements or reporting required under this MACT.

### Request for Variances or Alternatives

None.

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date: Not Applicable for minor modifications.  
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Robert Mullins  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The

Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Point of Contact**

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

Not applicable.